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6 Attorney for Daniel Bautista-Martinez
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 DANIEL BAUTISTA-MARTINEZ,

14 Defendant.
15

Case no. 2:21-cr-00276-JAD-EJY

**STIPULATION TO MODIFY
CONDITIONS OF PRETRIAL
RELEASE**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
17 Chiou, United States Attorney, and Edward G. Veronda, Assistant United States
18 Attorney, counsel for the United States of America, and Rene L. Valladares,
19 Federal Public Defender, and Jawara Griffin, Assistant Federal Public Defender,
20 counsel for Daniel Bautista-Martinez, that the conditions of pretrial release be
21 modified.
22
23

1 On October 27, 2021, Mr. Bautista-Martinez appeared before the Honorable
2 Magistrate Judge Cam Ferenbach for his initial appearance on a four-count
3 indictment and bond hearing. At the conclusion of the bond hearing, Mr. Bautista-
4 Martinez was released on a personal recognizance bond to comply with certain
5 conditions. One condition Mr. Batutista-Martinez had to comply with was that he
6 must not leave the District of Nevada.

7 Since his release, Mr. Bautisa-Martinez has maintained employment. As of
8 recent, Mr. Batutista-Martinez's employment is requiring him to leave the District
9 of Nevada. Mr. Bautista-Martinez has provided documentation to his Pretrial
10 Officer.

11 Mr. Bautista-Martinez is requesting this court to modify the travel
12 restriction condition of his pretrial release conditions. Defense Counsel has spoken
13 with Jessie Moorehead the assigned Pretrial Services Officer and Edward Veronda
14 the assigned Assistant United States Attorney both in agreement with the
15 modification.

16 ///

1 WHEREFORE, Mr. Bautista-Martinez is asking the Court to modify his
2 travel restriction condition of his pretrial release conditions. Special Condition
3 #4.

4 DATED this 15th day of February, 2022.

5
6 RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

7
8 By /s/ Jawara Griffin
JAWARA GRIFFIN
9 Assistant Federal Public Defender

By /s/ Edward G. Veronda
EDWARD G. VERONDA
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

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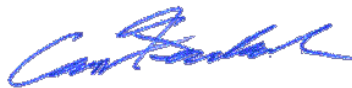
Case No. 2:21-cr-00276-JAD-EJY

ORDER

8 Based on the pending Stipulation of counsel, and good cause appearing,

9 IT IS THEREFORE ORDERED that the conditions of pretrial release are modified to
10 allow Mr. Bautista-Martinez to travel out of the District of Nevada solely for employment
11 assignments, only after ~~promptly notifying pre-trial of his designated travel.~~
12 providing Pretrial Services with advance notice of his out of district travel plan.

13 IT IS SO ORDERED.

14 

15 Cam Ferenbach
16 United States Magistrate Judge

17 DATED 2-15-2022